

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ST. MATTHEW'S UNIVERSITY
(CAYMAN) LTD., a Cayman Islands company,

Plaintiff,

vs.

SABA UNIVERSITY SCHOOL OF
MEDICINE FOUNDATION, a Netherland-
Antilles company; MEDICAL UNIVERSITY
OF THE AMERICAS, a St. Kitts & Nevis
company; EDUCATION INFORMATION
CONSULTANTS, INC., a Massachusetts
corporation; EDUCATIONAL INTERNATIONAL
CONSULTANTS, LLC, a Massachusetts
limited liability company; PATRICIA L. HOUGH,
M.D. an individual, and d.b.a. "Saba University
School of Medicine"; DAVID L. FREDRICK, an
individual; PANKAJ DESAI, M.D., an individual;
ASSOCIATION OF AMERICAN
INTERNATIONAL MEDICAL GRADUATES,
INC., a Nevada corporation, a.k.a.
"aaimg@yahoo.com"; THOMAS MOORE, M.D.
a.k.a. "presaaimg@hotmail.com" and
"crocdoc2004@netzero.net," an individual;
SARAH B. WEINSTEIN a.k.a.
"execsecaimg@hotmail.com," an individual;
RACHAEL E. SILVER, an individual; and
DIEDRE MOORE, an individual,

Defendants.

Case No.: CV-S-05-0848-RCJ(LRL)

AFFIDAVIT OF VINCENT F. O'ROURKE, JR.

I, Vincent F. O'Rourke, Jr., being sworn under oath depose and state as follows:

1. I am an attorney licensed to practice in the Commonwealth of Massachusetts.
2. I represent the defendant David L. Fredrick in this matter.

3. Attached hereto as Exhibit A are true and accurate copies of pages which appeared on the website of plaintiff, St. Matthew's University on March 10, 2006.

4. This attachment describes the Concurrent Degree Program maintained between St. Joseph's College of Maine and St. Matthew's University.

5. The fourth page of the attachment advises "You complete fourth and fifth semesters of your St. Matthew's MD program in Maine, a state known for its hospitality, recreation and breathtaking beauty during all four seasons. And you can easily have your family living with you while completing your coursework in Maine."

Signed under the pains and penalties of perjury this 10th day of March, 2006.



Vincent F. O'Rourke, Jr.

EXHIBIT A



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Concurrent Degree Program

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Saint Joseph's College of Maine

Through an affiliation with St. Joseph's College of Maine, St. Matthew's students can earn a Master of Science in Health Services Administration (MSHSA) degree from SJC while they are completing the Doctor of Medicine (M.D.) degree with SMU.

The MSHSA program is a wonderful complement to the medical degree. Training covers U.S. health care systems, organizational theory and behavior, health services administration, health care financial management, research methods, management information systems, ethical and legal perspectives, strategic management, health policy and politics, and three electives. Students who enroll in both programs gain invaluable skills to deal with managed health care in the United States.

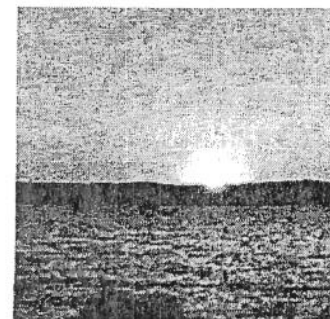
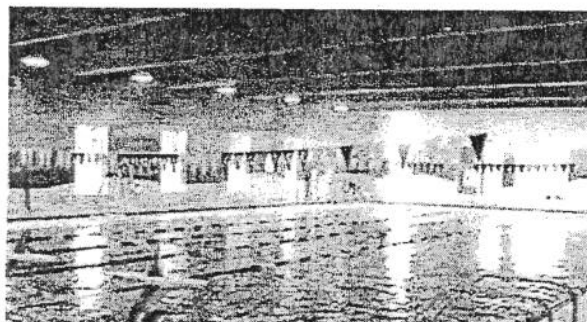
Saint Joseph's College of Maine was founded by the Sisters of Mercy in 1912 and is accredited by the New England Association of Schools and Colleges. The 331-acre campus is 18 miles from Portland, Maine, on the shores of Sebago Lake. Information about Saint Joseph's College of Maine can be found at www.sjcme.edu/smu or by contacting Ann L. Jalbert in the Saint Joseph's College, Division of Graduate and Professional Studies Admissions office:

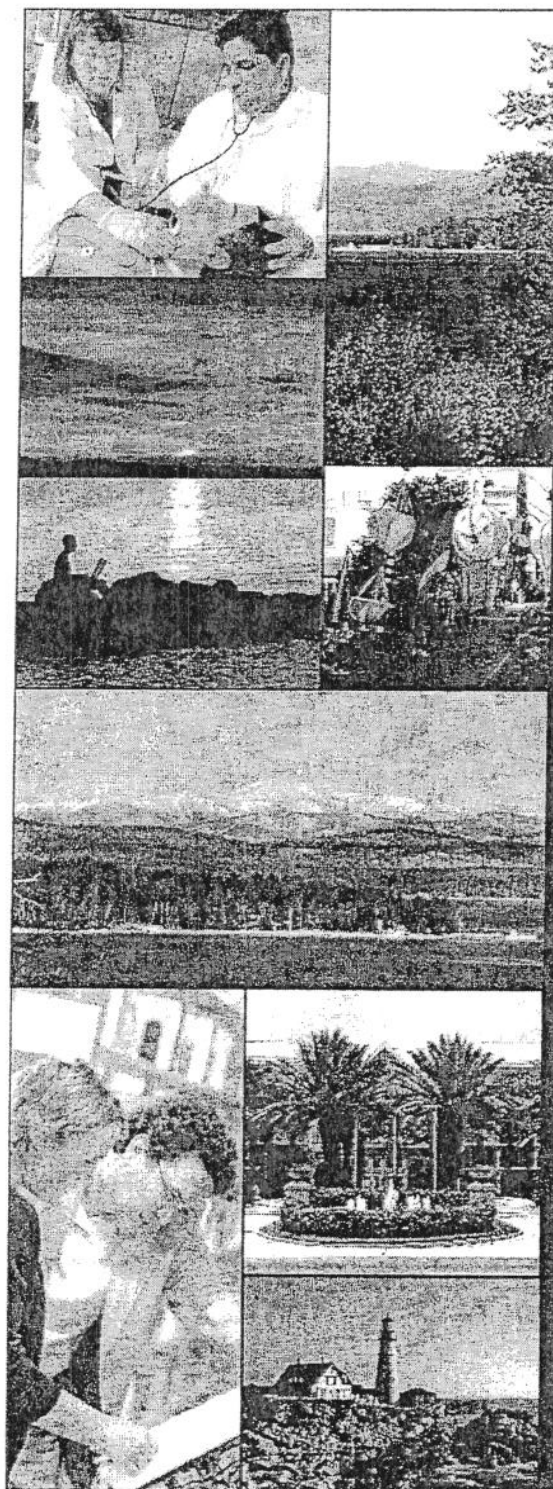
Telephone: 1-207-893-7761 or 1-800-752-4723 (US)

Fax: 1-207-892-7480

E-mail: ajalbert@sjcme.edu

[Click here for more information on the Concurrent Degree Program.](#)





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Have a question?
Need more information?
We are here to help you!

800-752-5668
207-893-7829

smu@sjcme.edu
www.sjcme.edu/smu

Saint Joseph's College of Maine

Gain a competitive edge

The employment outlook is strong in the health care industry for those with graduate degrees in administration.

- More and more, doctors need to have complementary skills to compete successfully for residencies and job positions. A Master in Health Services Administration (MHSA) degree gains you a significant advantage because it offers you mastery in leadership skills needed for a rapidly evolving health care industry.
- Through a unique Saint Joseph's College of Maine program, you can earn your MHSA at the same time you are earning your MD.
- According to the U.S. Department of Labor, a master's degree in health services administration, long-term care administration, or business administration is now the employment standard for most generalist management positions.
- With 2.8 million projected new jobs in the health care services sector through 2010*, there will be a strong demand for leaders and managers who are skilled beyond the MD degree to navigate complex health care systems.
- The MHSA will lead to better job opportunities in better facilities with better earning potential.

*U.S. Department of Labor, Bureau of Labor Statistics

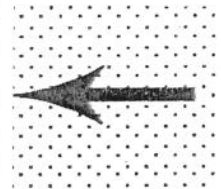


Program background

- Saint Joseph's College of Maine has offered the MHSA degree since 1985. In 1998 it established a unique concurrent degree program for St. Matthew's University medical students who would be able to enter the health care profession with a dynamic combination of credentials – the MD and the MHSA.

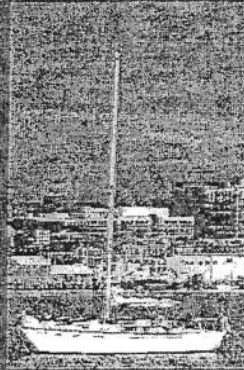
Why enroll in the MHSA?

- The practice of medicine today is much more regulated and complex than ever. Potential employers will look favorably on the skills and knowledge your dual degree offers in the area of regulatory and legal issues, labor, liability, demographics and technology.
- Pursuing the MHSA degree enables you to apply for the Stafford Student Loan, a federal financial aid program of low-interest loans.
- You complete fourth and fifth semesters of your Saint Matthew's MD program in Maine, a state known for its hospitality, recreation and breathtaking beauty during all four seasons. And you can easily have your family living with you while completing your coursework in Maine.
- The Maine campus offers excellent resources, including the extensive holdings of the Wellchan Library. Borrowing privileges among a number of southern Maine libraries expand your research reach even further while in Maine, including that of nearby Maine Medical Center, which was recently named one of the Top 100 Hospitals in the United States.



- The Saint Joseph's campus in Maine offers a truly magnificent lakeside location on 331 acres. Just 15 miles northwest of Portland, Maine's liveliest city, and two hours from Boston, the campus hugs the shore of Sebago Lake in one of the most enjoyable four-season recreation areas in the state.

- You won't even have to leave our campus to enjoy the outdoors: head down to the beachfront to lounge or go for a swim, walk the wooded trails, or sit in the dining hall to enjoy the sweep of trees and lake amid the backdrop of the White Mountains.



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Learn in a magnificent Maine setting

- Nearby Portland offers shopping, art galleries and beaches, professional sports teams, the public market, a wide range of musical and stage venues, and, of course, unforgettable seafood right off the fishing boats.

- If you're on campus during the annual Summer Program, you can live in traditional residence halls, townhouses, or suite-style living quarters. Every room offers an e-mail account, cable television and a high-speed Internet connection. When you want a break from your studies, the Alford Recreation Center provides an indoor running track, climbing wall, pool, and fitness center, as well as student lounge areas. Off-campus housing includes a variety of options and can be easily arranged.

- We like to call learning at Saint Joseph's College of Maine: "Academic excellence in a magnificent setting!"

MHSA snapshot

- As a graduate of St. Matthew's University, you will be qualified to practice medicine. As a graduate of Saint Joseph's College, you also will be qualified to practice health care management. The MHSA program equips you to serve effectively as a leader in the field of health care.
- The MHSA degree integrates learning, scholarship and experience. It emphasizes social and economic public policy, organizational and financial management, human resources and policy planning, ethics, and leadership skills so important to developing effective health care managers.

Curriculum

Core Curriculum (18 semester-hour credits)

- United States Health Care Systems
- Leadership in Health Care Administration
- Quality Management & Performance Improvement
- Health Care Financial Management
- Research Methods
- Strategic Planning & Management

Practice Management Specialty (15 credits)

- Practice Management Concepts & Strategies
- Practice Operations Management
- Strategic Human Resources Management
- Ambulatory Care Administration
- Managed Care & Reimbursement

Electives (6 credits – two courses from a list of 16, including:)

- Medical Informatics
- Delivering Health: Transcultural Health Perspectives
- The Regulatory & Financial Environment of International Health Care
- Health Policy & Politics

Capstone Course (3 credits; choose one option)

- Applied Research Paper
- Applied Management Project
- Mentored Practicum





Program requirements

- To earn the Master in Health Services Administration, you must satisfactorily complete 42 graduate credits, with an overall Grade Point Average of 3.0 or higher. These credits consist of a core curriculum of six courses, five courses in the Practice Management specialty, two elective courses, and the concluding Capstone coursework that serves as the final integrative study.

- In order to complete this graduate program concurrently as you earn your Doctor of Medicine degree, you will need to begin your first semester of medical school and the MHSA program at the same time (see note below). Thereafter, you must complete two MHSA courses each semester along with your pre-clinical science courses at St. Matthew's University. At the end of the fifth semester, you have four remaining MHSA courses that are completed either as distance education courses or by attending courses in Maine during the annual Summer Program.

Note: Although it is possible to begin the MHSA program after your first semester, you must enroll no later than your third semester. Starting later than the first semester, however, means additional MHSA courses via distance education, once the MD is completed.